



IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

v.

SON HOANG NGUYEN,

Defendant.

Case No. 1:20-CR-155 (LMB)

STATEMENT OF FACTS

The United States and the defendant, SON HOANG NGUYEN (hereinafter, "the defendant"), agree that at trial, the United States would have proven the following facts beyond a reasonable doubt with admissible and credible evidence:

1. The defendant is an engineer who also owns a cryptocurrency mining business.
2. From at least in or about September 2019 through at least in or about December 2019, in the Eastern District of Virginia and elsewhere, the defendant did unlawfully, knowingly, and intentionally combine, conspire, confederate, and agree, to unlawfully, knowingly, and intentionally distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 846.
3. During the course and in furtherance of this conspiracy, the defendant was personally involved in the distribution of, or it was reasonably foreseeable to the defendant that his co-conspirators distributed or conspired to distribute in furtherance of the conspiracy, at least 5 kilograms but less than 15 kilograms of a mixture or substance containing a detectable amount of methamphetamine.

4. During all relevant times, the defendant resided in Annandale, Virginia, within the Eastern District of Virginia. The defendant agreed with others, both known and unknown, to distribute peach tablets being held out as Adderall for monetary gain. The peach tablets were advertised as Adderall through a darknet vendor using the moniker “addy4cheap.” The defendant agreed with others to ship drugs ordered from “addy4cheap” on the Empire Market and Cryptonia through the U.S. Mail nationwide using postage paid for with cryptocurrency, specifically Bitcoin. The peach tablets that the defendant and his co-conspirators distributed were a mixture or substance that contained a detectable amount of methamphetamine.

5. Between August 2019 and December 2019, law enforcement agents conducted 20 controlled purchases from “addy4cheap” on both the Empire Market and Cryptonia for a total of 767 peach tablets received weighing approximately 268 grams total. The tablets received by law enforcement had markings of “A D” and “30” which is consistent with known markings for 30 milligram Adderall tablets.

6. To avoid detection, the defendant’s co-conspirators (1) mailed drug parcels that did not have their true names and addresses listed as the return information, (2) deposited those parcels at various United States Parcel Service (“U.S.P.S.”) collection boxes in the Eastern District of Virginia, (3) handled packages in a manner to avoid leaving fingerprints, and (4) operated in the late evening or early morning hours. The defendant told one of his co-conspirators not to “go to just one box,” emphasizing the importance of “switch[ing] up” locations for drops and the need to “spread them out.” Packages mailed by the defendant’s co-conspirators resembled those obtained through controlled purchases made by law enforcement through “addy4cheap.”

7. During the evening hours of September 24, 2019, at Ronald Reagan Washington National Airport it was discovered that one of the defendant’s co-conspirators, TYLER PHAM,

was carrying over \$30,000 in U.S. Currency. PHAM indicated that he was traveling to California with a friend. Investigators then made contact with the defendant near the departure gate who was found to be carrying \$71,000 in U.S. Currency. A drug-detecting K-9 alerted to the money carried by PHAM and the defendant and the money was seized by law enforcement.

8. On or about December 9, 2019, pursuant to a search warrant, law enforcement searched the residence of one of the defendant's co-conspirators, Hon Lam LUK. In that residence, investigators found over 6,000 peach tablets weighing approximately 2.2 kilograms which resemble those advertised on "addy4cheap" vendor pages and those received by law enforcement through controlled purchases. That residence also contained multiple envelopes, baggies, raisin boxes, a printer and other materials consistent with the packaging materials used in parcels obtained through controlled purchases from "addy4cheap." Approximately 400 grams of MDMA tablets, marijuana, vape cartidges, a money-counting machine, and U.S. currency were also found.

9. Also on or about December 9, 2019, pursuant to a search warrant, law enforcement searched the residence of two other of the defendant's co-conspirators, PHAM and Lien Kim Thi PHAN. In that residence law enforcement found 95 peach tablets resembling those advertised on "addy4cheap" vendor pages and those received during controlled purchases as well as 100 MDMA tablets. The peach tablets and the MDMA tablets were packaged in black foil bags similar to those received through law enforcement controlled purchases from "addy4cheap." In that residence was also U.S. currency, two pistols, and one shotgun.

10. Pursuant to these search warrants, investigators also seized several electronic devices from the defendant's co-conspirators. The seized devices contain communications between the defendant and co-conspirators concerning "addy4cheap" customer addresses, quantity

of tablets ordered, correspondence with customers, and instructions for how to mail materials and for storing the supply of purported Adderall tablets, among other topics.

11. The defendant communicated with co-conspirators in person and by phone using various messaging applications. The defendant reviewed orders on the “addy4cheap” sites on both the Empire Market and Cryptonia and sent co-conspirators lists of the names, addresses, and quantity of tablets for orders placed to be fulfilled.

12. The defendant told one co-conspirator to take over responding to customers from another and provided responses to pass on to customers. He also said in a group chat with co-conspirators that he thought that they needed to find “a safe place to store all the add,” and said his co-conspirator should “just get enough daily to package,” and “don’t put everything at your crib.” The defendant also told co-conspirators “don’t save anything on your pc,” “make sure to save everything to a usb,” and “and make sure your usb is encrypted.”

13. The Empire Market lists “addy4cheap” as becoming a member on May 24, 2019. As of December 10, 2019, “addy4cheap” had completed 3,665 sales on the Empire Market and received 2,568 reviews. These reviews included negative feedback from different customers stating that the tablets sold by “addy4cheap” were pressed and contained methamphetamine. Each review lists the total amount spent in U.S. dollars by the reviewing customer. Based on these reviews, as of December 10, 2019, “addy4cheap” had received approximately \$482,572.10 from its sales on the Empire Market for an approximate 44,872 pills sold. Cryptonia listed “addy4cheap” as becoming a member on June 29, 2019. As of November 7, 2019, “addy4cheap” had fulfilled 140 transactions on Cryptonia.

14. This statement of facts includes those facts necessary to support the plea agreement between the defendant and the United States. It does not include each and every fact known to

the defendant or to the United States, and it is not intended to be a full enumeration of all of the facts surrounding the defendant's case.

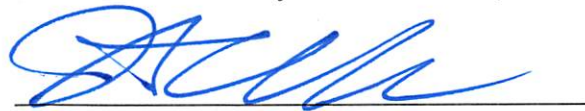
15. The actions of the defendant, as recounted above, were in all respects knowing and deliberate, and were not committed by mistake, accident, or other innocent reason.

Respectfully submitted,

G. Zachary Terwilliger
United States Attorney

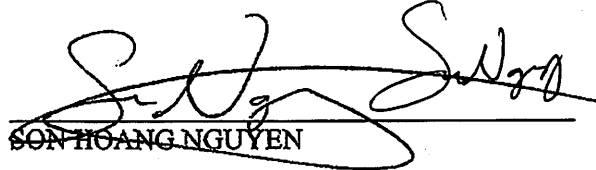
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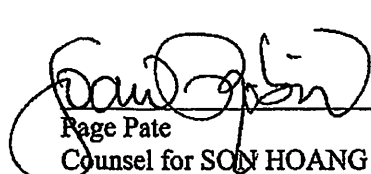


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Jay V. Prabhu
Assistant United States Attorneys

After consulting with my attorney and pursuant to the plea agreement entered into this day between the defendant, SON HOANG NGUYEN, and the United States, I hereby stipulate that the above Statement of Facts is true and accurate, and that had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.

 07-16-20
SON HOANG NGUYEN

I am Page Pate, defendant's attorney. I have carefully reviewed the above Statement of Facts with him. To my knowledge, his decision to stipulate to these facts is an informed and voluntary one.

 7/16/20
Page Pate
Counsel for SON HOANG NGUYEN
Joan Robin
Counsel for SON HOANG NGUYEN